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MERCYFALLS & CN FL Corp a Florida Corporation,

Defendant.

EXTEND DEADLINE FOR DEFENDANT MOTION TO COMPEL ARBITRATION, STAY LITIGATION, OR IN THE ALTERNATIVE TO DISMISS

(FIRST REQUEST)

IT IS HEREBY STIPULATED AND AGREED, by and between Plaintiff Sentinel Holdings Ltd f/k/a James Maritime Holdings, Inc. ("Plaintiff"), through its counsel of record Womble Bond Dickinson (US) LLP and Defendant MercyFalls & CN FL Corp. ("Defendant") through its counsel of record, Sklar Williams PLLC (collectively "the Parties"), as follows:

- 1. On March 26, 2025, Defendant filed its Motion to Compel Arbitration, Stay Litigation, or In the Alternative to Dismiss ("Motion to Compel"). (ECF 8).
- 2. On or about April 9, 2025, Plaintiff filed its Opposition to Defendant's Motion to Compel. (ECF 10).
 - 3. Pursuant to LR II 7-2(b), the deadline to file and serve any reply in support of the

1	Motion to Compel is seven (7) days after service of the response, or on or before April 16, 2025.			
2	4. The Defendant's principal is observing the religious holiday of Passover from			
3	April 12 through April 19, 2025, making it difficult for him to provide input into the reply during			
4	this time.			
5	5.	5. Accordingly, pursuant to LR IA 6-1(a), the Parties have agreed to extend the		
6	deadline for Defendant to file a Reply in Support of the Motion to Compel by approximately			
7	seven (7) days in order to accommodate the religious observance of Passover.			
8	6.	No discovery deadlines or dates for trial have been set.		
9	7.	7. Therefore, the Parties stipulate and agree that Defendant shall have up to and		
10	including April 23, 2025 within which to file its Reply in Support of the Motion to Compel.			
11	8.	8. This is the Parties' first request to extend Defendant's Reply deadline and is made		
12	for the reasons set forth herein and not for purposes of delay.			
13	Dated this 1	1 th day of April, 2025.	Dated this 11th day of April, 2025.	
14	WOMBLE	BOND DICKINSON (US) LLP	SKLAR WILLIAMS PLLC	
15	By: /s/ J Chi	ristopher Jorgensen	By: /s/ Stephen R. Hackett	
16	J Christophe	er Jorgensen, Esq. e Bar No. 5382	Stephen R. Hackett, Esq. Nevada Bar No. 5010	
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18		.jorgensen@wbd-us.com	Email: shackett@sklar-law.com	
19		ra (Admitted Pro Hac Vice)	-and-	
20		tate Bar No. 297314 BOND DICKINSON (US) LLP	Raja Rajan, Esq. Rajan Law Group (<i>Pro Hac Vice forthcoming</i>)	
21	400 Spectrum Irvine, CA 9	m Center Drive, Suite 1700 22618	Pennsylvania Bar 58849 2009 Chestnut Street	
22	Email: jack.	altura@wbd-us.com or Plaintiff Sentinel Holdings Ltd.,	Philadelphia PA 19103	
23		Maritime Holdings, Inc.	Email: raja@rajanlawgroup.com Attorneys for Defendant	
24	IT IS SO ORDERED.			
25	A SOURCED.			
26				
27	UNITED STATES DISTRICT JUDGE			
28	DATED: April 14, 2025			